Meaningful Use:
A Guide for Health Department Immunization Programs

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Immunization Information Systems Support Branch

Meaningful Use Overview

- A program of the Centers for Medicare & Medicaid Services (CMS)

- Incentivizes physicians & hospitals to adopt, implement, & upgrade Electronic Health Record (EHR) systems to "certified EHR technology"

- To qualify for incentives, providers will have to "meaningfully use" these EHR systems

"Meaningful Use" (MU) is:

❑ **Defined by regulations issued by the Office of the National Coordinator for Health Information Technology (ONC)**

❑ **A collection of standards for how EHR systems should function in the healthcare provider environment**

❑ **To be implemented in three stages**

❑ **Wide-ranging; immunization is only one of many issues/programs addressed**

MU standards that impact Immunization Programs

- ❑ **Connecting to an immunization registry is one of three public health "menu options."**
  - ▪ Stage 1…test message only, after successful test message, continue to report per local guidelines (2011-2012)
  - ▪ Stage 2…not yet defined, will likely include routine submission of Immunization data
  - ▪ Stage 3…also not yet defined, may require bidirectionality (2013-2015)
- ❑ **Only applicable to providers & hospitals who *actually administer immunizations***
- ❑ **Data exchange must utilize HL7 2.3.1 or 2.5.1**

Role of Public Immunization Programs in Meaningful Use

Provide HL7 connectivity capacity so EHRs can connect to IIS

- Unidirectional (reporting-only) capacity is sufficient at Stage 1 (and probably Stage 2), but bidirectional (reporting plus supporting record queries) may be necessary by Stage 3
- Partial funding support to achieve this capacity may be available through Medicaid Health Information Technology (HIT) initiatives

❑ **Provide localized HL7 standard & implementation guide to requesting providers/EHR vendors**

Some Historical Context…

❑ **CDC has been promoting HL7 connectivity since 1999**

- ▪ Improving immunization coverage requires improving clinical immunization practice

- ▪ Timely, up-to-date, consolidated records *at the point and time of care* are key to improving practice

- ▪ Clinical workflow dictates that consolidation of systems (such as EHR linkage to IIS) simplifies and therefore improves participation

❑ **ARRA and PHPH funding initiatives are directed toward just this sort of interoperability**

"Meaningful Use" is not asking Immunization Programs to do new things…it's new stakeholders asking us to do the same things!

Limits of Public Immunization Programs' Role in Meaningful Use

Public health is *NOT* responsible to:

❑ **Set or clarify MU standards**

❑ **Certify or promote any EHR product as MU-ready**

❑ **Certify providers as meeting any MU standard**

- It is the provider's responsibility to **attest** to CMS that they've met the standards

- Attestation for the Immunization Registry option involves having submitted a test message to your IIS, which may or may not succeed

- Some IIS are setting up separate servers to accept these tests without contaminating live IIS data, or because IIS is not yet HL7-ready

- If the IIS will be unable to accept test messages (even through a test server) in 2011-2012, providers may be granted a waiver

Limits of Public Immunization Programs' Role in MU

Public health is *NOT* responsible to:

☐ Adapt its IIS to accommodate non-standard EHR submissions

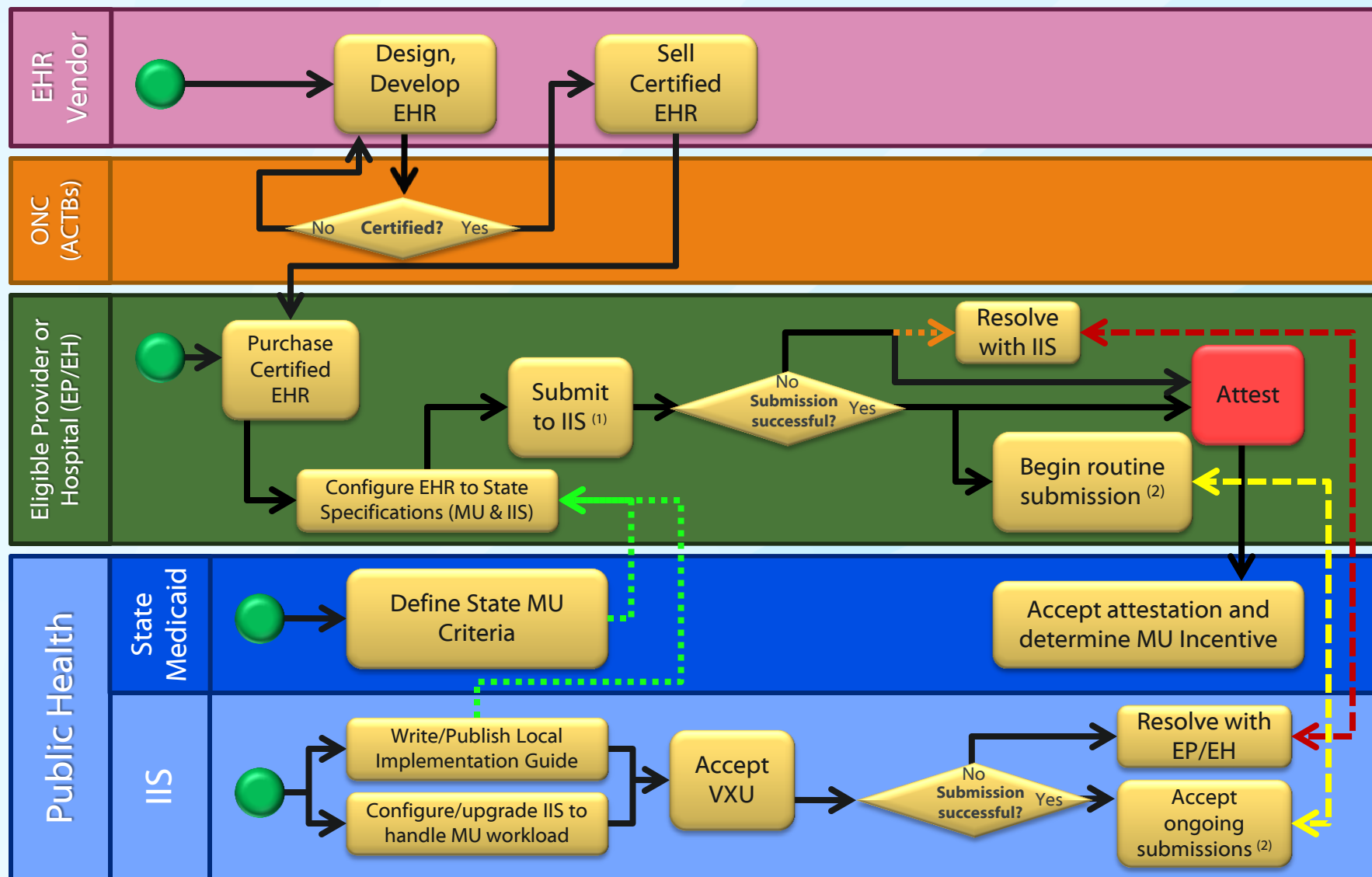☐ Support the installation or configuration of any EHR (this is the vendor's role)

Public Health programs may provide such support to facilitate good provider relations, but it is not a requirement of CDC or CMS to do so

Preparing for MU

❑ **Ensure your IIS is HL7-ready**

- Don't forget that Stage 2 & 3 are coming; HL7 query-and-response are being considered for Stage 3 [1]

- Evaluate hardware capacity & network bandwidth

- Evaluate your staffing to support new provider connectivity

❑ **Develop provider qualification & validation protocols**

❑ **Prepare your local HL7 Implementation Guide**

(1) See HIT Policy Committee, MU Working Group Request for Comment http://healthit.hhs.gov/media/faca/MU_RFC%20_2011-01-12_final.pdf , page 12, Stage 3 Proposed. "During well child/adult visits, providers review IIS records *via their EHR*. "

Operational Responsibilities in Immunization MU Stage 1

EHR Vendor

Design, Develop EHR → Sell Certified EHR

ONC (ACTBs)

Certified? — No / Yes

Eligible Provider or Hospital (EP/EH)

Purchase Certified EHR → Configure EHR to State Specifications (MU & IIS) → Submit to IIS [1] → Submission successful? — No / Yes → Resolve with IIS → Attest → Begin routine submission [2]

Public Health

State Medicaid

Define State MU Criteria

Accept attestation and determine MU Incentive

IIS

Write/Publish Local Implementation Guide
Configure/upgrade IIS to handle MU workload
→ Accept VXU → Submission successful? — No / Yes → Resolve with EP/EH
Accept ongoing submissions [2]

(1) If IIS is configured to accept submissions   (2) In accordance with local regulation and subject to IIS readiness/requirements

Adapted from a schema originally presented at an AIRA Meaningful Use workshop March 27, 2011 by Mike McPherson of the Kansas Immunization Program

Handling inquiries on MU

- ❑ **Know the scope of your authority!**
- ❑ **Refer questions you can't answer, to the appropriate bodies:**

Query type	Refer to
EHR Vendor seeking certification	ONC-Approved Testing & Certification Bodies (ATCBs)
Non-immunization provider	State Medicaid office
Anyone seeking clarification on MU rules	CMS website, State Medicaid office

So, have you been contacted?

We'd like to hear from you if your program has begun receiving Meaningful Use-related test messages from eligible providers:

1. Have you received any test messages?
2. Have any providers, following successful tests, begun routine submission of immunization data to your IIS?

Please email Dan Martin **dwm5@cdc.gov** with either "yes" or "no" answers…we'd like to hear from all programs.

Important References

- ❑ **CDC MU website:** http://www.cdc.gov/ehrmeaningfuluse/
- ❑ **CMS MU website:** http://www.cms.gov/EHRIncentivePrograms/
- ❑ **ONC Final Rule:** http://edocket.access.gpo.gov/2010/pdf/2010-17210.pdf
- ❑ **ONC ATCB website:** http://healthit.hhs.gov/portal/server.pt/community/healthit_hhs_gov__onc-authorized_testing_and_certification_bodies/3120
- ❑ **List of ONC-certified EHRs:** http://onc-chpl.force.com/ehrcert

Thanks!

For more information please contact Centers for Disease Control and Prevention Immunization Information Systems Support Branch

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